

ORIGINAL  
2 to Clerk/0UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MAR 26 2002

PER 9/8  
HARRISBURG, PA DEPUTY CLERK

YORK WALLCOVERINGS, INC.

Plaintiff

No.: 1:CV:01-0793

vs.

S.A. MAXWELL COMPANY, INC. AND  
JAIMA BROWN

Defendants

(The Hon. Sylvia H. Rambo)

**MOTION FOR LEAVE REGARDING DEPOSITION  
OF WILLIAM CARROLL**

Plaintiff York Wallcoverings, Inc. ("York") hereby seeks leave to take the deposition of William Carroll, a Canadian citizen, on Monday, April 29, 2002. Counsel for Defendants concurs in this Motion. Discovery in this matter closes on Friday, March 29, 2002 and a hearing on Plaintiff's request for a preliminary injunction has been scheduled by the Court to commence on Tuesday, April 30, 2002. Defendants intend to present Mr. Carroll as a witness at the injunction hearing, thereby Mr. Carroll will travel to Harrisburg, Pennsylvania from his home in Canada. In an effort to avoid costly and time consuming travel, Plaintiff and Defendants have agreed to take Mr. Carroll's deposition on the day before the Court ordered injunction hearing. By allowing the parties to depose Mr. Carroll on the day before the injunction hearing, substantial expense and time of counsel and the witness will be saved. Taking the

deposition of Mr. Carroll on the 29<sup>th</sup> of April will not delay the hearing on the preliminary injunction nor will it cause delay in the underlying action.

BARLEY, SNYDER, SENFT & COHEN, LLC

Date: 3/25/02

BY: 

Bruce J. Wolstoncroft, Esquire  
Kendra D. McGuire, Esquire  
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Court I.D. No. 43923  
Court I.D. No. 50919

**CERTIFICATE OF SERVICE**

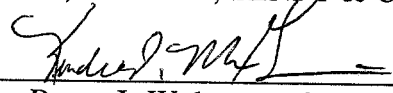
I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Leave has been served this 25<sup>th</sup> day of March, 2002, by first-class mail, postage pre-paid, upon:

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